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October 12, 2004

Filed Electronically

Mr. Donald Abelson  
Chief, International Bureau  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

RE: CC Dkt. No. 94-102 and IB Dkt. No. 99-67

Globalstar MSS 911 Call Center Pre-Implementation Status Report

Dear Mr. Abelson:

Pursuant to the Second Report and Order, FCC 04-201 (released Aug. 25, 2004), in the above-referenced dockets, and Public Notice, Report No. SPB-210 (Sept. 24, 2004), Globalstar USA, LLC hereby submits its MSS 911 Call Center Pre-Implementation Status Report for the Globalstar MSS system operating in the 1.6/2.4 GHz bands.

If there are questions, please contact the person indicated in the report or the undersigned.

Respectfully submitted,



William D. Wallace

Enclosure

## **Globalstar MSS 911 Call Center Pre-Implementation Status Report**

As required by the FCC in its Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, IB Docket No. 99-67, *Second Report and Order*, FCC 04-201 (released Aug. 25, 2004), Globalstar USA, LLC ("GUSA") is submitting this 911 Call Center Pre-Implementation Status Report. GUSA, a wholly owned subsidiary of Globalstar LLC ("GLLC"), provides sales and rentals of Globalstar voice and data satellite phone equipment and services to customers throughout the United States and the Caribbean.

### **Contact Information**

For the purpose of this report, the GLLC and GUSA contact is:

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### **GUSA Coverage Area**

GUSA provides Globalstar service in the continental US and Alaska, including coastal waters, as well as in the Caribbean basin, including Puerto Rico and the US Virgin Islands. GUSA does not provide service in Hawaii at this time.

### **Call Center Information**

Since the inception of commercial service in the US in February 2000, GUSA has offered its customers a free "Emergency Call-Assistance Service" ("ECAS") which, in GUSA's experience, provides reliable public safety access to its subscribers. This service is offered in conjunction with Globalstar Canada and is available 24 hours a day, seven days a week, every day of the year. GUSA's ECAS provides emergency assistance not only for callers dialing "911," but also abbreviated emergency dialing codes such as 112, 119 and 113 that are used overseas, all of which are routed to a central service bureau. The numbers 911, \*911, #911, 112, \*112, 113, 119 are supported. Also, GUSA Customer Care service representatives are directed to relay any emergency calls that they receive to the ECAS.

For its service bureau, GUSA uses Lifeline Systems Canada Inc. ("Lifeline"), 95 Barber Greene Rd, Suite 105, Toronto, Ontario, Canada M3C 3E9.

When a Globalstar subscriber in the US dials 911 (or another recognized emergency short-code), the Globalstar gateway routes that call to a pre-determined direct-in-dial number at Lifeline's Call Center. All US-originated calls (outside of Puerto Rico and the Caribbean) within gateway coverage using pre-defined emergency dialing codes, including calls routed through GUSA's Canadian and US gateways, are routed to this central service bureau. Since there exists no centralized database for emergency support for the Caribbean, emergency calls originating from Puerto Rico or the US Virgin Islands are instead routed to a voice announcement notifying the caller that 911 calling is not available from those particular areas.

Lifeline answers the call, "Globalstar Emergency Response Center." (Languages other than English can be supported as needed.) Lifeline Emergency Response Representatives answer all calls and immediately inquire, "Are you okay?" and, "Do you need help?" The Representative also asks, "Please provide me with your satellite phone

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number,” in case the call drops. Then the Representative begins to determine the specific location of the Globalstar caller by asking, “What city or state are you in?” or, “Do you have an address or street name or highway for where you are right now?”

Lifeline will enter the information provided by the caller into the Public Safety Answering Point (“PSAP”) database to locate the appropriate Emergency Service. Based on the city or town information provided by the Globalstar caller, the Emergency Response Representative queries the GUSA-provided PSAP database to obtain the contact number for the closest PSAP. The database contains 10-digit dialing information for PSAPs in US and Canada with their respective geographic jurisdictions (developed in cooperation with the National Emergency Number Association (“NENA”) and Public Safety Associates (“PSA”)). The Lifeline Representative then presses the conference button and dials the PSAP’s phone number, effectively “live transferring” or bridging the caller and the nearest PSAP. Lifeline disconnects from the call once communication between the Globalstar caller and PSAP has been initiated, and the PSAP has taken responsibility for the caller.

After leaving the call, the Lifeline operator enters an electronic record of the “alarm” call into the Lifeline database, including the details of the call such as the date and time of the call, the satellite phone number, the caller’s location, the PSAP called, and whether or not there was any difficulty connecting to an appropriate PSAP. All calls are documented. As of this date, the average speed of answer is approximately 17 seconds.

### **Customer Communications**

GUSA communicates the availability of Globalstar ECAS through the Terms and Conditions in the GUSA customer service agreements. The Terms and Conditions describe the availability of 911 Emergency Services applicable to GUSA subscribers and to subscribers of other Globalstar service providers roaming in GUSA’s territory. The Terms and Conditions explain the obligation of the caller to provide his or her phone number and location to the Emergency Call Assistance Center representative and the conditions of use under which the emergency call service is provided.

### **Implementation Issues**

In establishing its ECAS, GUSA has encountered several issues with respect to the availability of a comprehensive and accurate PSAP database for routing emergency calls. As mentioned above, there exists no centralized emergency support database for calls originating from Puerto Rico or the US Virgin Islands. In addition, a large portion of GUSA usage occurs on water, and the GUSA database identifies certain jurisdictions where the most appropriate PSAP is the US Coast Guard. Finally, PSAP lookup in the database may be slowed in identifying the appropriate PSAP for an unincorporated area. GUSA is currently investigating methods to improve the identification of the appropriate PSAP for US coastal waters and unincorporated areas.

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